

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

HANNAH CRAMER, et al., )  
                                )  
Plaintiffs,                 )  
v.                             )                           3:18cv39-HEH  
                                )  
ARKESIA, INC., et al.,     )  
                                )  
Defendants.                 )

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**NOTICE OF SCHEDULE CONFLICT/REQUEST FOR RELIEF**

On May 16, 2018, the Court set an initial pre-trial conference in this matter for Friday, June 15, 2018, at 11:00 AM.

On May 7, 2018, Judge Trenga of the Alexandria Division issued a Notice of Hearing in *Harrell v. Freedom Mortgage Corporation*, 1:18cv275-AJT-TCB, for June 15, 2018, at 10:00 AM. Judge Trenga's Notice is attached hereto as Exhibit A.

Justin P. Keating, Virginia counsel in this matter, is co-lead counsel for Plaintiffs in the Harrell matter and is arguing the Motion to Dismiss set for hearing on June 15<sup>th</sup>. Given that, Plaintiffs' counsel in this matter respectfully request either (a) Keating be excused from attendance at the initial pre-trial conference in this matter or (b) the conference be set for another date. Undersigned counsel discussed this with Defendant's counsel who has graciously agreed not to oppose this Request or either of these options. If the Court finds the first option otherwise appropriate, undersigned counsel assures the Court that Plaintiff's out of state counsel have thoroughly familiarized themselves with the Local Rules and this Court's practices on pre-trial litigation and will be well prepared to discuss any substantive or procedural matters that may arise

at the conference. As an alternative hearing date, all counsel are available for a pre-trial conference on June 22, 2018. If the Court finds it appropriate to re-schedule the conference from June 15<sup>th</sup> but June 22<sup>nd</sup> does not fit the Court's schedule, counsel will confer and offer additional mutually agreeable dates.

Draft Proposed Orders for each proposed Option have been filed with this Notice/Request.

Respectfully submitted,

\_\_\_\_\_/s\_\_\_\_\_

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**COUNSEL TO PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24<sup>th</sup> day of May, 2018, I will cause the foregoing Plaintiffs' NOTICE OF SCHEDULE CONFLICT/REQUEST FOR RELIEF with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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\_\_\_\_\_ /s/ \_\_\_\_\_

Justin P. Keating